

**From:** Corrado, John P. (Jack) [JCorrado@mofo.com]  
**Sent:** Friday, November 16, 2007 4:37 PM  
**To:** Darton, Terry  
**Subject:** Mirant Public hearing Public Comment by Neighbors.

Dear Ms. Darton:

I am a property owner in Alexandria next to the Mirant plant at 315 Hearthstone Mews. I am concerned about the level of particulates emitted from the Mirant plant. I understand that Mirant is using Trona to control emissions. I know that Trona is a white powder-like substance. I know it is abundantly found on our premises and in our air cleaning units. I don't know how much Trona is being emitted, and I don't know the health consequences of inhaling Trona.

Can someone provide answers to these questions at the public hearing on Monday Nov.19?:

Is there monitoring for Trona levels in the immediate neighborhood?

What are the consequences of Trona inhalation or ingestion?

What are the acceptable levels of Trona to avoid those consequences?

Thank you. Jack Corrado

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**From:** Corrado, John P. (Jack) [JCorrado@mofo.com]

**Sent:** Friday, November 16, 2007 6:13 PM

**To:** Darton, Terry

**Subject:** FW: Private Citizen comment on Proposed State Operating Permits (SOP) for Mirant Potomac River Generating Station (PRGS)

November 16, 2007

Dear Mr. Darton,

I live at 315 Hearthstone Mews in Alexandria, VA, within 1/10 mile from the Mirant PRGS. My background is as follows: BS in Geology from Duke University and MS in Geology from Virginia Tech. I received my MD from George Washington University in 1994 and am a Board Certified Physician (Obstetrics and Gynecology). So, I am interested both in trona as a mineral and in the health effects of trona inhalation.

I would like to offer the following comments on the above two proposals.

**1. Lack of Safety Data on Chronic Trona/Particulate Inhalation:** Both proposals appear to presume that "particulate" emission (and inhalation) does not pose a threat to public health. Both proposals will allow average particulate emission of approximately 4200 lbs per day. Neither proposal provides or references scientific or clinical data regarding what are safe inhalation levels. Furthermore, this exposure is not an isolated event but is a daily occurrence. Local residents will be chronically exposed to > two tons per day of particulate. Workers at the Mirant PRGS also are also daily exposed to the health effects of chronic inhalation of these particulates. (Pulmonary silicosis is a progressive, fatal condition that is a possible consequence of chronic exposure to the silica dust in trona.) Without a scientific basis for presuming that no adverse health consequences will be visited upon the public or the plant workers, permitting the Mirant PRGS to inject massive amounts of trona mineral to reduce sulfur dioxide emissions is unacceptable. It trades one public health problem (sulfur dioxide) for another public health problem (trona-induced respiratory disease).

**2. Incomplete Data in Mirant Report:** The Mirant Business Confidential Report dated January 16, 2006 and titled "Trona Injection Tests Mirant Potomac River Station Unit 1 November 12 to December 23, 2005" may have formed part of the basis for concluding that particulate emissions following trona injection decreased compared to operations without trona injection. This report is deficient in the following ways:

- "Appendix A", apparently the full report of test results, is not included in the information available to the public.
- Footnote 1 states the following: *"Although there had been an effort by another vendor to do test runs utilizing EPA methods 201A and 202 in November 2005, there are serious questions about the legitimacy of that sampling and analysis which continues to undergo an internal quality assurance/quality control review by the vendor. Mirant notified VADEQ of these concerns at the time and the referenced Dec. 20-23, 2005 runs were subsequently scheduled and conducted with VADEQ representatives in attendance."* This footnote implies that the results obtained by "another vendor" were less reassuring than the ones obtained by Mirant. The public is entitled to know the results obtained by the first vendor.
- Tables 4 and 5 only apply to Unit 1. It is unclear why data for other units were not obtained, and if they were, why these data are not available for review.

Conclusion 3 in this report reads as follows: *"The precipitator performance was not impacted in any way due to trona injection, regardless of trona injection rate. Stack particulate test results indicate precipitator performance actually improves with trona present, even with the increase in particulate to be collected by the precipitator when trona is injected"* Until this conclusion can be confirmed through repeat testing performed by an independent expert, plant operations should be immediately halted. No further discussion of State Operating Permits should be entertained until the fundamental safety issue of chronic particulate emission has been resolved.

**3. Recommendation for Conducting an Epidemiology Study on the Pulmonary Health of Residents and**

**Plant Workers:** An epidemiologic study should be conducted to compare long-term health effects of Mirant emissions on residents and plant workers. This study should be designed to include a "control" population matched to the local and workforce demographic, but not-exposed to plant emissions. Baseline and follow up health assessments should be part of this study design. Volunteers from both the test and control populations should be consented to permit autopsy results to be shared with the study investigators. (Although it is unpleasant to consider, autopsy evaluation of lung tissue and lymph nodes draining the respiratory system can definitively answer the question of whether particulates originating from the plant are found in the lungs of persons who died of respiratory illnesses.) The plant should be required to escrow funds for potential future compensation to victims of chronic trona inhalation. Establishing such a fund prospectively (i.e. while the plant is operating and generating revenues) will ensure that compensation is available in the event that Mirant declares bankruptcy.

I will be happy to discuss these comments at the public hearing or offline if you wish.

Sincerely,

Julia A. Corrado

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